

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

JENNIFER CLEMENS, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

EXECUPHARM, INC., and
PAREXEL INTERNATIONAL CORP.

Defendants.

Case No. 2:20-cv-03383

PROPOSED ORDER

AND NOW, this _____ day of November, 2022, upon consideration of the parties' Joint Motion to Stay Litigation Pending Settlement Discussions (Doc. No. 34), it is **ORDERED** that the motion is **GRANTED**, and this matter, including all deadlines, is **STAYED** pending settlement discussions between the parties.

Within 30 days of this Order, the parties must provide the Court with a status update, including to identify the date and time of the anticipated mediation.

IT IS SO ORDERED.

HONORABLE GERALD J. PAPPERT

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JOINT MOTION TO STAY LITIGATION PENDING SETTLEMENT DISCUSSIONS

Plaintiff Jennifer Clemens (“Plaintiff”) and Defendants ExecuPharm, Inc. and Parexel International Corp., (“Defendants,” and collectively with Plaintiff, the “Parties”) respectfully move the Court to stay this action in its entirety and in support show the Court as follows:

1. The Parties are discussing possible resolution of this action;
2. The Parties are working to identify a mutually agreeable mediator and mediation date;
3. In the interim, the Parties are discussing the exchange of information on an informal basis to facilitate the anticipated mediation and possible resolution of this action; and
4. Judicial economy favors a stay of this action while these discussions and the mediation process plays out. In particular, there is no reason for the Court to devote its time and resources to litigation that may very well be resolved by the Parties.

For these reasons, the Parties respectfully move the Court to stay this action in its entirety, including without limitation Defendants’ deadline to submit their reply brief in support of their Motion to Dismiss the Complaint, ECF No. 33, currently set for November 11, 2022. The Parties

will submit a status report within thirty (30) days to provide the Court with a status update, including to identify the date and time of the anticipated mediation.

Respectfully submitted,

/s/ Mark S. Goldman

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***Counsel for Defendants ExecuPharm, Inc.
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Dated: November 1, 2022

CERTIFICATE OF SERVICE

I, Mathieu J. Shapiro, hereby certify that I electronically filed a true and correct copy of the foregoing with the Clerk of Courts, via CM/ECF, which will send notification of the filing to all counsel of record.

Date: November 1, 2022

/s/ Mathieu J. Shapiro
Mathieu J. Shapiro